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9 as Trustee of the Ramey Colby 2007 Trust.

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17 THE UNITED STATES BANKRUPTCY COURT
18 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re:) Case Nos. 19-30088 (DM)

21 PG&E CORPORATION,) Chapter 11

22 -and-)

23 In re:)

24 PACIFIC GAS AND ELECTRIC
25 COMPANY,

26 Debtors.

- 27 ☐ Affects PG&E Corporation)
28 ☐ Affects Pacific Gas and Electric)
☒ Company)
☒ Affects both Debtors)

MOTION FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL TO:
MICHAEL RAMEY; MICHAEL RAMEY
AND ASSOCIATES, INC.; AND MICHAEL
RAMEY AS TRUSTEE OF THE RAMEY
COLBY 2007 TRUST

* All papers shall be filed in the lead case, No. 19-30088(DM)

JUDGE: Hon. Dennis Montali

1 Dreyer Babich Buccola Wood Campora, LLP (hereinafter referred to as "Dreyer Babich"),
2 counsel of record¹ for: Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey as
3 Trustee of the Ramey Colby 2007 Trust (hereinafter collectively referred to as "Creditors"), by and
4 through its attorneys of record, respectfully submits this Motion for Order Authorizing Withdrawal
5 of Counsel to: Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey as Trustee
6 of the Ramey Colby 2007 Trust (hereinafter referred to as the "Motion").
7

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9 **EVIDENTIARY SUPPORT**

10 This Motion is supported by the Declaration of Steve M. Campora, which is filed
11 concurrently herewith.
12

13 **FACTUAL BACKGROUND**

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15 1. On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed
16 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States
17 Bankruptcy Court, in and for the Northern District of California (hereinafter referred to as the
18 "Court"), commencing case numbers 2019-30088 (DM) and 2019-30089 (DM) (hereinafter
19 collectively referred to as the "Bankruptcy Cases"). *Declaration of Steve Campora*, ¶4.
20

21 2. The Court set a Claims Bar Date for October 21, 2019, which was later extended up
22 to and including December 31, 2019.
23

24 3. Dreyer Babich was retained by Creditors to represent them in the Bankruptcy Cases.

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¹ Dreyer Babich retained Pino & Associates to, among other things, assist it in filing this motion. Pino & Associates has no contractual or attorney/client relationship with Creditors.

4. On October 2, 2019, Dreyer Babich timely filed three (3) separate Proofs of Claim in the Bankruptcy Cases on behalf of Creditors, which were assigned claim numbers 27325, 30710, and 30720 (hereinafter collectively referred to as the "Proofs of Claim"), seeking damages on behalf of Creditors from the Camp Fire. *Declaration of Steve M. Campora*, ¶15.

5. Since the filing of the Proofs of Claim, irreconcilable differences have developed between Creditors and Dreyer Babich to such an extent that the attorney-client relationship has broken down and is no longer sustainable. Based on these circumstances, good cause exists for the Court to enter an order relieving Dreyer Babich as counsel for Creditors.

ARGUMENT

Pursuant to Civil L.R. 11-5, entitled “Withdrawal from Case,” which is in force in the Northern District of California and is made applicable to these Bankruptcy Cases pursuant to B.L.R. 1001-2(a), entitled “**Incorporation of Civil Local Rules**” (emphasis found in original):

[c]ounsel may not withdraw from an action until relieved by order of the Court after written notice has been provided, reasonably in advance, to the client and to all other parties who have appeared in the case.

The Standing Committee on Professional Responsibility and Conduct of the State Bar of California has opined that “. . ., for purposes of the motion to withdraw, it will be sufficient to state words to the effect that ethical considerations require withdrawal or that there has been an irreconcilable breakdown in the attorney-client relationship.” Formal Opinion No. 2015-192.

In this case, after the filing of the Proofs of Claim, an irreconcilable breakdown of the attorney-client relationship between Creditors and Dreyer Babich has occurred. This constitutes good cause for the Court to grant leave for Dreyer Babich to withdraw as counsel of record for Creditors.

1 To the extent that Creditors request that Dreyer Babich turn over any files or information to
2 which they are entitled, Dreyer Babich will cooperate and transmit such files. *Declaration of Steve*
3 *M. Campora, ¶6*
4


5 **CONCLUSION**
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7 For the reasons set forth herein, it is respectfully requested that the Court enter an Order:
8

- 9 1. Granting the Motion; and
10 2. Authorizing Dreyer Babich to withdraw as counsel for record for Creditors.
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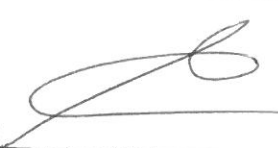
12 Dated: MAY 10, 2022

Respectfully submitted,
DREYER BABICH BUCCOLA
WOOD CAMPORA, LLP

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16 By: 
17 Steve Campora, Counsel for
18 Creditors, Michael Ramey;
19 Michael Ramey and Associates, Inc.; and
Michael Ramey as Trustee of the Ramey
Colby 2007 Trust

20 Dated: MAY 10, 2022

PINO & ASSOCIATES

21
22
23 By: 
24 Estela O. Pino, Counsel for
25 Dreyer Babich Buccola
26 Wood Campora, LLP
27
28